

ACCESSIBILITY POLICY

Management Policy



Effective:
December 19, 2022

Next Review Date:
November 2024

Overview

This Accessibility Policy is made in accordance with OPTrust's obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* and the regulations thereunder, including the Integrated Accessibility Standards.

This policy applies not only to employees (including contract and temporary employees) and candidates for employment but also applies to the manner in which OPTrust provides services to members, members of the OPSEU Pension Plan and members of the public.

General

Purpose and Scope

The Accessibility Policy (the "Policy") sets out OPTrust's vision and goals for developing and implementing its accessibility policies in accordance with its obligation under the *Accessibility for Ontarians with Disabilities Act, 2005* and the regulations thereunder, including the Integrated Accessibility Standards, as updated from time to time (collectively, "AODA"). The Policy outlines OPTrust's accessibility standards for information, communication and employment in accordance with AODA.

Classification: [Internal](#)

Statement of Organizational Commitment

As an organization, OPTrust is committed to meeting the accessibility needs of persons with disabilities in a timely manner in accordance with our focus on inclusion, diversity and equity, and the requirements of AODA.

Guiding Principles

OPTrust's approach to accessibility is rooted in our organizational values that all persons are entitled to the respect, integrity, collaboration, teamwork, inclusion, diversity, and equity of opportunity. OPTrust is committed to providing services in a way that respects the dignity and independence of persons with disabilities and ensures that all of our members, employees (including contract and temporary employees), candidates for employment, and members of the OPSEU Pension Plan (the "Plan") receive equitable treatment without discrimination and with accommodation, where required. In keeping with this approach, OPTrust endeavours not just to meet regulatory requirements, but to implement accessibility best practices.

Legal Framework

AODA establishes a framework and standards for accessibility related to goods, services, facilities, employment, accommodation and buildings with a view to increasing accessibility for all residents of Ontario. Under AODA, OPTrust is required to:

- establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy

to prevent and remove barriers and meet its statutory requirements;

- post the accessibility plan on its website and provide the plan in an accessible format upon request; and
- review and update the accessibility plan at least once every five years.

The AODA standards do not limit or replace the requirements of the Ontario Human Rights Code or any other laws governing accommodation of people with disabilities.

Compliance Standards

OPTrust strives at all times to provide services in a way that respects the dignity and independence of people with disabilities, by ensuring all people with disabilities receive accessible services with the same quality and timeliness as others do.

General Accessibility Standards

Training

OPTrust will ensure that training is provided to all employees and any other persons who participate in the development and implementation of the ADOA Policies, and every other person who provides goods, services or facilities on behalf of OPTrust. Training will be provided on:

- the requirements of the Integrated Accessibility Standards;
- the Human Rights Code as it pertains to the protection of persons with disabilities; and
- the AODA policies required by the Integrated Accessibility Standards.

OPTrust will maintain a record of the training provided, including the dates and participants.

Information and Communication Standards

Feedback

OPTrust will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities. Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications. OPTrust will notify employees, members, candidates for employment and the public that accessible formats and communications supports are available in respect of its feedback procedures.

Accessible Formats and Communication Supports Available Upon Request

All organizational information is made available to Plan members and the public in an accessible format or via accessible communication support upon request. OPTrust will consult with the person making the request to determine the suitability of an accessible format or communication support provided. Timeframes for this information will be dependent upon the format requested but in all cases the information will be provided as soon as is practicable and at no greater cost than that charged to persons not requesting the information in that format. OPTrust notifies Plan members and the public about the availability of accessible formats and communication supports through its website as well as its communication materials.

Multi-Year Accessibility Plan

OPTrust has published a multi-year accessibility plan to improve the accessibility of its goods, services and facilities in compliance requirements of the AODA. The accessibility plan is posted on its website and Intranet and will be provided in an accessible format upon request. OPTrust will review and update the accessibility plan at least once every five years.

Accessible Websites and Web Content

OPTrust's websites and web content conform with WCAG 2.0, Level AA for web content. OPTrust continues work towards increasing the accessibility of its existing web content, website and web-based applications.

Accessible Emergency Information

OPTrust will provide emergency response information and assistance to Plan members and the public in an accessible format or with appropriate communication supports as soon as practicable upon request.

Customer (Member) Service Standards

This section applies to all members of the Plan, including employees of OPTrust in their capacity as members of the OPSEU Pension Plan.

Further information on these principles can also be found in OPTrust's Accessible Customer Service Policy, which is posted on the OPTrust website.

Assistive Devices

OPTrust is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. Plan members with disabilities may use their personal assistive devices when accessing OPTrust facilities and services and, in cases

where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access OPTrust's facilities and services. OPTrust will ensure that staff know how to use assistive devices available on the premises for Plan members, and informs Plan members of the assistive devices that are available.

Use of Service Animals and Support People

People with disabilities may bring their service animal on to parts of our premises that are open to the public or other third parties.

OPTrust will ensure that all staff are trained on how to interact with people with disabilities who are accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter OPTrust's premises or third party premises on which OPTrust is sponsoring an event that are open to the public, or other third parties with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises or at an event sponsored by OPTrust on third-party premises. OPTrust will ensure that all staff are trained on how to interact with people with disabilities who are accompanied by a support person. When support people are required for OPTrust-sponsored meetings, consultations or events (e.g., sign language interpreters, real-time captioners, attendants), OPTrust will arrange to pay support people directly for their time and reasonable travel expenses upon request, in accordance with OPTrust's travel and expense guidelines.

On rare occasions, a manager may determine that a support person is required for a person

with a disability, or that a service animal cannot enter an area of the premises due to the application of another law. In these instances, managers will suggest, following consultation with the individual in order to determine their needs, appropriate alternatives, and will provide assistance.

Communication Needs

OPTrust is committed to meeting the communication needs of people with disabilities and will work with an individual to provide information in an accessible format and with suitable communication supports, as and where necessary. OPTrust trains all staff on how to interact and communicate with people with various types of disabilities.

Notice of Temporary Disruptions

OPTrust will provide members with notice in the event of a planned or unexpected disruption in the facilities or services used by people with disabilities. This notice will include information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (if any). The notice will be placed at all public entrances on OPTrust's premises. Depending on the nature of the disruption, notice will also be provided on outgoing telephone messages and on OPTrust's public website. This notice will be provided in accessible formats.

Employment Standards

This section applies to all employees and candidates for employment within OPTrust.

Recruitment, Assessment and Selection

OPTrust is committed to fair and accessible employment practices. Accommodations are available on request for candidates taking part in all aspects of the recruitment, assessment and selection process.

OPTrust will notify the public and employees of the availability of accommodation for job applicants during the recruitment process. Internal and external applicants who have been selected to participate in an interview or selection test will be notified that accommodation is available upon request if the applicant requires accommodation due to a disability. OPTrust will consult with applicants to determine how to best meet their needs.

Successful candidates will be notified of our policies for accommodating employees with disabilities when the offer of employment is made.

Informing Employees of Support and Creation of Individual Accommodation Plans

Employees at OPTrust will be advised of OPTrust's policy for supporting employees with disabilities, including providing employment-related accommodations and emergency response plans for staff with disabilities. Employees with disabilities will have an accessible individual accommodation plan developed by the People team in consultation with the employee. The plan will include considerations for performance management, career development and redeployment.

Accessible Formats and Communication Supports

Where an employee with a disability requests it, OPTrust will consult with the employee and provide or arrange for the provision of accessible formats and communication support for information that is needed to perform the employee's job, or for information that is generally available to employees in the workplace. However, where the needs of an employee with a disability may be accommodated in various different ways, OPTrust reserves the right to determine the

accessible format or communication support that will be provided in the circumstances.

Workplace Emergency Response

OPTrust shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. This includes, where required, the creation of individualized emergency response plans which are accessible so employees with disabilities can understand them. With the employee's consent, OPTrust will assign designated response persons to provide the necessary support during an evacuation, providing the employee with a copy of the plan and following up with the employee periodically to ensure the plan is up-to-date. OPTrust will review the individualized workplace emergency response information when (i) the employee moves to a different work location, (ii) the employee's overall accommodation needs or plans are reviewed, and/or (iii) OPTrust reviews its general emergency response policies.

Documentation of Individual Accommodation Plans and Return to Work

OPTrust will maintain a written process for the development of documented individual accommodation plans. The People team will develop and use a standard template for the development of individual accommodation plans and return-to-work programs. An individual accommodation plan prepared for an employee will include:

- Information on Accessible Formats or Communication Supports provided to the employee.

- Any individualized workplace emergency response plan developed for the employee.
- Any other forms of accommodation being provided to the employee as a result of his or her disability.

OPTrust also has a written process for any employee who may be returning to work following a disability-related leave of absence. The process includes the steps taken to facilitate the employee's return to work and the development of any required individual accommodation plan on return.

For more information, please consult Accommodation Process on the intranet.

Performance Management

OPTrust will proactively pursue solutions for the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Career Development, Advancement and Redeployment

OPTrust will proactively pursue solutions for the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development, advancement and redeployment to its employees with disabilities.

Roles and Responsibilities		
Policy Approver	Management Human Resources and Compensation Committee (MHRCC)	Responsible for approving the policy
Executive Sponsor	Vice-President, People	Ultimately accountable for the policy, including its development, implementation and administration.
Policy Sponsor	Director of Inclusion, Diversity and Equity	Responsible for the day-to-day administration of the policy
Revision History		
December 19, 2022	<ul style="list-style-type: none"> Updated/reformatted to reflect new corporate policy template Removed redundant risk appetite, delegations and amendment provisions 	
November 24, 2023	<ul style="list-style-type: none"> Reviewed – no changes made 	



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